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Counsel for Defendant, DOUGLAS STORMS YORK

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. 15-00226 EJD
	)	
Plaintiff,	)	DEFENDANT DOUGLAS STORMS
	)	YORK'S AMENDED PROPOSED
v.	)	VERDICT FORM
	)	
	)	Pretrial Conf.: August 24, 2015
DOUGLAS STORMS YORK,	)	
	)	Time: 10:00 a.m.
Defendant.	)	Trial Date: August 25, 2015

Defendant Douglas Storms York submits the amended proposed verdict form attached as Exhibit A.

Dated: August 14, 2015

Respectfully submitted,

STEVEN G. KALAR  
Federal Public Defender

/s/ Graham Archer

GRAHAM ARCHER  
Assistant Federal Public Defender

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 15-00226 EJD
	)	
Plaintiff,	)	VERDICT
	)	
v.	)	
	)	
DOUGLAS STORMS YORK,	)	
	)	
Defendant.	)	
_____	)	

**COUNT ONE: 18 U.S.C. § 912 – False Impersonation of An Employee of the United States**

1) Did the government prove beyond a reasonable doubt that Mr. York falsely assumed and pretended to be an employee acting under the authority of the United States Internal Revenue Service?

\_\_\_\_\_ NO

\_\_\_\_\_ YES (proceed to question two)

1 2) Did the government prove beyond a reasonable doubt that Mr. York acted in such a  
2 manner as an employee of the United States Internal Revenue Service, by falsely stating he  
3 was an Agent of the Internal Revenue Service engaged in investigating tax records?  
4

5 \_\_\_\_\_ NO

6 \_\_\_\_\_ YES (proceed to question three)  
7

8 3) Did the government prove beyond a reasonable doubt that Mr. York acted with the intent  
9 to defraud?

10 \_\_\_\_\_ NO

11 \_\_\_\_\_ YES  
12

13 If you answered “No” to questions one, two or three, you must find Mr. York Not Guilty of  
14 the offense as charged in Count One.  
15

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16  
17 **COUNT TWO: 47 U.S.C § 223(a)(1)(C) – Telecommunications Device Harassment**

18 1) Did the government prove beyond a reasonable doubt that Mr. York did not disclose his  
19 identity?

20 \_\_\_\_\_ NO

21 \_\_\_\_\_ YES (proceed to question two)  
22

23 2) Did the government prove beyond a reasonable doubt that Mr. York acted with the intent  
24 to abuse, threaten and harass a specific person?

25 \_\_\_\_\_ NO

26 \_\_\_\_\_ YES (proceed to question three)

1 3) Did the government prove beyond a reasonable doubt that Mr. York used a  
2 telecommunications device that moved through interstate and foreign communications?

3 \_\_\_\_\_ NO

4 \_\_\_\_\_ YES

5  
6  
7 If you answered “No” to questions one, two or three, you must find Mr. York Not Guilty of  
8 the offense as charged in Count Two.

9  
10  
11 Therefore, we the jury in the above-captioned case, unanimously find the Defendant, Douglas  
12 Storms York:

13  
14 \_\_\_\_\_, (*Not Guilty or Guilty*) of False Impersonation of a Federal  
15 Employee, in violation of 18 U.S.C. § 912.

16  
17 \_\_\_\_\_, (*Not Guilty or Guilty*) of Telecommunications Device  
18 Harassment, in violation of 47 U.S.C. § 223(a)(1)(C).

19  
20  
21 Dated: \_\_\_\_\_, 2015

22 \_\_\_\_\_  
JURY FOREPERSON